

Review Comment

Docket Information

Docket ID FDA-2005-0012-0001

Long Title Frozen Desserts; Petition to Revoke Standards for Goats Milk Ice Cream and Mellorine and to Amend Standards for Ice Cream and Frozen Custard, Sherbet, and Water Ices; Petition to Amend Standards for Parmesan and Reggiano Cheese

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- Federal eRulemaking Portal: <http://www.regulations.gov>. Follow the instructions for submitting comments.
- Agency Web site: <http://www.fda.gov/dockets/ecomments>. Follow the instructions for submitting comments on the agency Web site. Written Submissions Submit written submissions in the following ways:

- FAX: 301-827-6870.
- Mail/Hand delivery/Courier [For paper, disk, or CD-ROM submissions]: Division of Dockets Management (HFA-305), Food and Drug Administration, 5630 Fishers Lane, rm. 1061, Rockville, MD 20852. To ensure more timely processing of comments, FDA is no longer accepting comments submitted to the agency by e-mail. FDA encourages you to continue to submit electronic comments by using the Federal eRulemaking Portal or the agency Web site, as described in the Electronic Submissions portion of this paragraph. Instructions: All submissions received must include the agency name and Docket No(s). or Regulatory Information Number (RIN) for this rulemaking. All comments received may be posted without change to <http://www.fda.gov/ohrms/dockets/default.htm>, including any personal information provided. For detailed instructions on submitting comments and additional information on the rulemaking process, see the Comments heading of the SUPPLEMENTARY INFORMATION section of this document. Docket: For access to the docket to read background documents or comments received, go to <http://www.fda.gov/ohrms/dockets/default.htm> and insert the docket number(s), found in brackets in the heading of this document, into the Search box and follow the prompts and/or go to the Division of Dockets Management, 5630 Fishers Lane, rm. 1061, Rockville, MD 20852.

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Category Food Industry - C0025

<http://www.regulations.gov/fdmspublic-rel11/custom/jsp/comment/publicCommentForm...> 12/20/2005

2003 P-0132

C16

Parmesan Aging Requirements

The Antigo Cheese Company feels FDA should not change the standard aging requirement for all Parmesan Cheese, because 1) the dry grated product does not conform to the same standards as fresh Parmesan, 2) if we change the standard why have any standard for any cheese, and finally 3) changing the standard will allow the European Union to claim more cheese varieties as Protected Designation of Origin.

Dry Grated Parmesan is not the same product as Fresh Parmesan. The following chart illustrates the differences of the product. The age of product is only but one component of how the product is presented to the consumer.

	Fresh Parmesan - generally 32% Moisture 40% FDB's 3-4% Salt	Dry Grated - generally 18% Moisture <40% FDB's 3-4% Salt Cellulose added as processing aid
Meets Standard of Identity	Must meet the Standard of Identity at the <u>start</u> of processing if any processing is required	Only at the end. Typically high moisture solids are force cured and when dried they pass below 32% moisture thus making them legal
Declaration of origin	Must declare country of origin if made outside of country	If processed in United States, then it does not have to declare it is imported since processed here
Taste	Must in its original form taste and function like Parmesan	The homogeneous processed blend of cheese from various sources can "pretend" to taste like Parmesan, while the cheese doesn't need to be Parmesan, i.e. Goya, Hard Grating Cheese, NESIO, Flavor additives

If we change the standard for all Parmesan then the question becomes at what point do we not have a standard! At what point do we lose the standard of identity on all cheese. Why not change moisture or fat for an economical advantage, why is aged singled out? Why not just make processed cheese with enzymes that taste like Parmesan that meets the CFR standard. That too would be an economical advantage, and since it would taste close to Parmesan the consumer would not be harmed. But it is not Parmesan. Parmesan is cheese that develops its flavor over time through the natural process of bacteria which changes milk sugar into amino acids to give the cheese its distinctive flavor, color and texture.

The Dairy Industry is in the middle of world trade, and we need to act accordingly. The EU will take advantage of the US's miss cue on Parmesan so they can claim it as a Protected Designation of Origin product. We can not change the product so much that it doesn't even come close to the traditional Parmesan, then the EU will have a case that it is different. Parmesan, by our own rule making, could become the "poster cheese" for other varieties like Feta to lose their identifiable names. This will put at risk Cheddar, Gorgonzola etc. We as an industry must recognize that we are in a Global Economy and our standards need to remain.

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